



30th April 2010

The Telecom Regulatory Authority of India
Mahanagar Doorsanchar Bhawan
Jawahar Lal Nehru Marg (Old Minto Road)
Next to Zakir Hussain College
New Delhi – 110 002

Subject: Comments on “Allocation of Spectrum for Technologies such as DECT to meet the Residential and Enterprise Intra-Telecommunication Requirements”

Dear Sir,

With reference to your request for comments on “Allocation of Spectrum for Technologies such as DECT to meet the Residential and Enterprise Intra-Telecommunication Requirements” dated February 19, 2010, views of Tata Teleservices Limited are appended as below.

Road Block on the Growth Path of CDMA Technology

The Authority has recommended allocation of 20 MHz between 1880 to 1930 MHz for DECT operations and the band should be de-licensed but protected.

You will appreciate that NFAP has identified frequency band 1900-1910 paired with 1980-1990 MHz is for CDMA network for their growth path for CDMA and there has been successful field conducted under the aegis of WPC so that this band can be utilized along with 3G band as per IND 55. We also note that the present inadequacy of the spectrum in 800 MHz band does not provide any growth path for CDMA beyond 4 carriers. To ensure growth path, the Authority has also recommended that CDMA operators be allocated spectrum in 450 MHz and 1900 MHz band; which we see as the natural growth path for CDMA. There is no availability of spectrum in 450 MHz; therefore, the only available path for growth path for CDMA service is in 1900-1910/1980-1990 MHz. Hence, this band needs to be protected for providing growth path for CDMA and in no case DECT service be allowed in the band 1900-1910 paired with 1980-1990 MHz.

Duplicity of Service

The growth of mobile service is unprecedented in our country. The industry is adding about 15 Million subscribers on monthly basis and mobile tariff is one of the lowest in the world. Therefore, in such scenario, there is no scope for introducing another parallel service such as DECT, which provides similar service as cellular.

The recommendation of the Authority is allocation of a suitable band of 20 MHz between 1880 to 1930 MHz for DECT operations. This is an overlap with the IMT (3G) band. The NFAP has identified 1920-1980 MHz paired with 2110-2170 MHz for IMT (3G) services. Given the global importance of 3G services and the very small quantity of 2100 MHz spectrum which has been



made available for commercial purposes in India, we would like to submit that the entire IMT band should only be considered for IMT (3G) applications – i.e. in no case should 1920-1930 MHz be allocated for services other than IMT.

Demerit of De-licencing of DECT Band

NFAF has identified 1880-1900 MHz for requirements of micro cellular wireless access systems (fixed/mobile) for telecommunication services based on TDD access techniques, especially indigenously developed technologies, capable of coexistence with multiple operators.

There is always a risk of interference from the un-licensed bands. This is evident from the existing de-licenced band. The band being proposed by the Authority on both sides has mobile service operations and for smooth operations it is essential to protect these services from undue interference.

The proposal of the Authority to make 1880-1900 MHz band license free for Residential and Enterprise Applications while continuing to license it for Fixed Wireless Local Loop operators. This approach leaves a significant loophole to be exploited because the same service would then be provided by one set of operators at zero or no regulatory cost while another set would be hobbled by license fee and spectrum usage payments. This would create serious competitive distortions on relation to substitutable services – not to speak of the revenue and security implications.

The introduction of DECT technology on an unlicensed basis would raise a host of issues regarding competitive distortions and losses to the exchequer since unlicensed services would be competing with, and substituting for licensed fixed and mobile services.

In view of the above, we earnestly request the Authority that the proposal regarding allocation of spectrum for technologies such as DECT to meet the Residential and Enterprise intra-telecommunication requirements is not feasible and status quo be maintained.

Thanking you and looking forward for favorable consideration of our recommendations by the Authority in the interest of transparency, level playing field and growth of mobile industry in India.

Yours sincerely,

A handwritten signature in black ink, appearing to be 'Anand Dalal', written over a printed name.

Anand Dalal

**Vice President – Corporate Regulatory Affairs
Tata Teleservices Limited
And
Authorized Signatory
Tata Teleservices (Maharashtra) Limited**